



05-29-2002

U.S. Patent & TMOs/TM Mail Rpt Dt. #11

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

NATIONAL FOOTBALL LEAGUE  
PROPERTIES, INC. and JACKSONVILLE  
JAGUARS, LTD.,

Opposers,

-against-

APPLIED MAPPING, INC.,

Applicant.

Opposition No. 124,732  
Opposition No. 151,429

**STIPULATION TO CONSOLIDATE**

WHEREFORE, on or about August 20, 2001, Opposers filed a notice of opposition to application serial number 75/908,221 for the mark JAGSONVILLE, Opposition No. 151,429;

WHEREFORE, on or about August 20, 2001, Opposers filed a notice of opposition to application serial number 75/908,222 for the mark JAGSONVILLE.COM, Opposition No. 124,732;

WHEREFORE, on or about February 15, 2002, Applicant filed an answer to Opposers' notice of opposition to application serial number 75/908,222 for the mark JAGSONVILLE.COM, Opposition No. 124,732;

WHEREFORE, Opposition Nos. 124,732 and 151,429 involve the same parties, substantially identical marks and substantially identical questions of fact and law;

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WHEREFORE, Opposition Nos. 124,732 and 151,429 may be presented on the same record without appreciable inconvenience or confusion; and

WHEREFORE, consolidation of Opposition Nos. 124,732 and 151,429 would be equally advantageous to both parties in the avoidance of the duplication of effort, loss of time, and the extra expense involved in conducting the proceedings individually.

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned attorneys for the parties, as follows:

1. Applicant shall answer Opposition No. 151,429 by June 6, 2002.
2. Opposition Nos. 124,732 and 151,429 shall then be consolidated.
3. Opposition Nos. 124,732 and 151,429 shall then be presented on the same records and briefs.
4. The discovery and testimony periods for the consolidated Opposition Nos. 124,732 and 151,429 shall then be set as follows:
  - (a) Discovery period to open: May 17, 2002;
  - (b) Discovery period to close: November 13, 2002;
  - (c) 30-day testimony period for party in position of plaintiff to close: February 11, 2003;
  - (d) 30-day testimony period for party in position of defendant to close: April 12, 2003; and
  - (e) 15-day rebuttal testimony period for plaintiff to close: May 27, 2003.

Dated: New York, New York  
May 29, 2002

Respectfully submitted,

WHITE & CASE LLP

By: 

Robert L. Raskopf  
Jennifer L. Johnson  
Gerard N. Saggese III  
1155 Avenue of the Americas  
New York, New York 10036

ATTORNEYS FOR OPPOSERS NATIONAL  
FOOTBALL LEAGUE PROPERTIES, INC.  
AND JACKSONVILLE JAGUARS, LTD.

-and-

Dated: Jacksonville, Florida  
May \_\_, 2002

DRAUGHON PROFESSIONAL  
ASSOCIATION

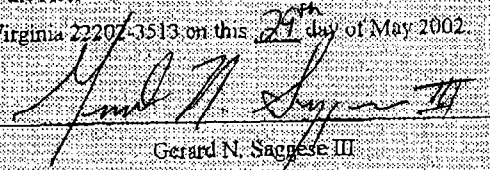
By: 

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ATTORNEYS FOR APPLICANT APPLIED  
MAPPING, INC.

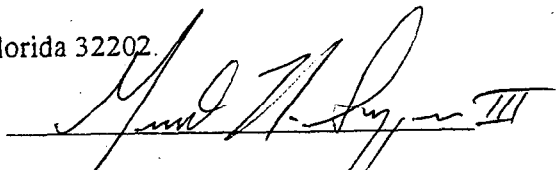
SO ORDERED,

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CERTIFICATE OF MAILING BY "EXPRESS MAIL"	
"Express Mail" mailing label number:	<u>EL 2368 724 7546</u>
I hereby certify that this document is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service in an envelope addressed to the Assistant Commissioner for Trademarks, 2900 Crystal Drive, Arlington, Virginia 22202-3513 on this <u>21<sup>st</sup></u> day of May 2002.	
Signature	 Gerard N. Sagnese III

CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2002, I caused to be served a copy of the parties' STIPULATION TO CONSOLIDATE by first-class mail, postage prepaid, to the attorneys for Applicant, addressed to Cheryl Meide, Esq., Draughon Professional Association, One Independent Drive, Suite 2000, Jacksonville, Florida 32202.

  
Gerard N. Saggese III

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May 29, 2002

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Re: National Football League Properties, Inc. and Jacksonville Jaguars, Ltd. against Applied Mapping, Inc.; Opposition Nos. 124,732 and 151,429

To the Assistant Commissioner of Trademarks:

I enclose the parties' Stipulation to Consolidate the above-referenced opposition proceedings. Please stamp and return the enclosed postcard to acknowledge receipt for our files.

Sincerely,



Gerard N. Saggese III

Enclosures

cc: Anastasia Danias, Esq. (NFL Properties LLC)  
Robert L. Raskopf, Esq. (White & Case LLP)

Cheryl Meide, Esq. (Draughton Professional Association)

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